



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

May 20, 2020

PROMPT REPLY NECESSARY
VIA EMAIL

Brosval Chemicals, Inc.
P.O. Box 1144
Peñuelas, PR 00624
Attn: Jorge Valdivieso, President
CepedaPR@CepedaLaw.com

Re: Supplemental Request for Information Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, § 9604(e), relating to the PROTECO Site in Peñuelas, Puerto Rico

Dear Mr. Valdivieso:

The United States Environmental Protection Agency ("EPA") is charged with responding to releases or threatened releases of hazardous substances, pollutants, and/or contaminants into the environment, and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601-9675 ("CERCLA"), also known as the "Superfund" law. For your information, a copy of the Superfund law may be found at www.epa.gov/superfund.

This letter seeks your cooperation in providing information and documents related to the contamination of the PROTECO Site ("the Site") and to supplement the information provided in Brosval Chemicals, Inc.'s May 23, 2019 response to EPA's March 28, 2019 Request for Information. We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to the attached Supplemental Request for Information **within 21 calendar days** of your receipt of this letter. EPA acknowledges that the COVID-19 pandemic may be impacting your business. If that is the case, we will consider your specific circumstances in determining an appropriate timeline for responding to this Supplemental Request for Information, while still ensuring that the Agency receives the information it needs in a timely manner.

EPA has documented the release or threatened release of hazardous substances into the environment at the Site. Pursuant to CERCLA, EPA has spent public funds and anticipates spending additional public funds at the Site. Background information concerning the Site was provided in EPA's March 28, 2019 Request for Information.

REQUEST FOR INFORMATION

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority to require persons to provide the following: information and/or documents relating to materials generated, treated, stored, or disposed of at or transported to a facility; the nature or extent of a release or threatened release of a hazardous substance, pollutant, or contaminant at or from a facility; and the ability of a person to pay for or perform a cleanup.

While EPA seeks your cooperation in this investigation, your compliance with the attached Supplemental Request for Information is required by law. In preparing your response to this Supplemental Request for Information, please follow the instructions provided in Attachment A.

As addressed in more detail in the attached Supplemental Request for Information, EPA has reason to believe that you, Mr. Jorge Valdivieso, are the President of Brosval Chemicals, Inc. and are or were an officer of Compañia Ganadera Del Sur, Inc. and may possess information relevant to our inquiry that may be provided by responding to the attached Supplemental Request for Information.

When you have prepared your response to the Supplemental Request for Information, please sign and have notarized the enclosed "Certification of Answers to Request for Information," and return and/or scan and email that Certification to EPA along with your response. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law. In addition, Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with a Request for Information. In the event that the COVID-19 pandemic impacts your ability to obtain the services of a notary public, we will consider your specific circumstances in determining whether to waive the notarization requirement.

Some of the information EPA is requesting may be considered by you to be confidential business information. Please be aware that you may not withhold the information on that basis. If you wish EPA to treat all or part of the information confidentially, you must advise EPA of that fact by following the procedures described in the Instructions included in Attachment A, including the required support of your claim of confidentiality.

If you have information about other parties who may have information that may assist EPA in its investigation of the Site or who may be responsible for the material stored or disposed of at the Site, that information should be submitted within the time frame noted above. Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by this Supplemental Request for Information, you must promptly notify EPA and turn over the additional or different information to EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501-3520.

Your response to this Supplemental Request for Information, which we encourage you to submit electronically, should be sent to the following:

Zolymar Luna
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 Rd 165, km 1.2
Guaynabo, Puerto Rico 00968-8069
luna.zolymar@epa.gov

and to:

Andrea Leshak, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866
leshak.andrea@epa.gov

If you have any questions regarding this letter, or would like to discuss the matter with EPA, you may call Ms. Luna at (787) 977-5844 or email her at the email address listed above. Please direct all inquiries from an attorney to Ms. Leshak at (212) 637-3197 or at the email address listed above.

We appreciate your attention to this matter and look forward to your prompt response to this letter.

Sincerely yours,

ERIC WILSON Digitally signed by ERIC WILSON
Date: 2020.05.20 17:22:24 -04'00'

Eric J. Wilson
Acting Director
Superfund and Emergency Management Division

Enclosures

ATTACHMENT A

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

DIRECTIONS

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Supplemental Request for Information. For each question contained in **Attachment B** of this letter, if information responsive to this Supplemental Request for Information is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.
3. Provide the Best Information Available. Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees and/or agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliance with this Supplemental Request for Information. Whenever in this Supplemental Request for Information there is a request to identify a natural person or an entity, state, among other things, the person or entity's full name and present or last known address.
4. Identify Sources of Answers. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
5. Inability to Answer or Provide Documents. If you are unable to answer a question in a detailed and complete manner or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name and last known address and telephone number and the reason for your belief.
6. Documents. If anything is deleted from a document produced in response to this Supplemental Request for Information, state the reason for, and the subject matter of, the deletion.
7. Continuing Obligation to Provide and to Correct Information. If additional information or documents responsive to this Supplemental Request for Information become known or available to you after you respond to this Supplemental Request for Information, EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA. If after submitting your response, you discover that information you submitted is incorrect, it is necessary that you promptly notify EPA and correct such information.

8. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F). If you make a claim of confidentiality for any of the information you submit to EPA, you must separately address the following points:
- a. the portions of the information alleged to be entitled to confidential treatment;
 - b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
 - c. measures taken by you to guard against the undesired disclosure of the information to others;
 - d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
 - e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
 - f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "CONFIDENTIAL" on all responses and any related documents you assert to be confidential. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if applicable, after which the information needs no longer to be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA review. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e)(7) of CERCLA and EPA's pre-disclosure notification procedures. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. EPA provides no assurances that all information that you assert as confidential business information will not be publicly disclosed. Any determination regarding public disclosure will be based on a review of the information and relevant countervailing factors.

9. Disclosure to EPA Contractor. Information that you submit in response to this Supplemental Request for Information may be disclosed by EPA to authorized

representatives of the United States, pursuant to 40 C.F.R. Part 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA may disclose all responses to this Supplemental Request for Information to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Supplemental Request for Information. Pursuant to 40 C.F.R. Part 2.310(h), private contractors must sign a contractual agreement that prohibits the disclosure of such information to anyone other than EPA without the prior written approval of each affected business or of an EPA legal office. If you are submitting information that you assert is entitled to treatment as confidential business information, you may comment on this potential disclosure within fourteen (14) days of receiving this Supplemental Request for Information.

10. Personal Privacy Information. Personnel and medical files and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as “Personal Privacy Information.”
11. Objections to Questions. If you have objections to some or all the questions within the Request for Information letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words insofar as they appear in this Supplemental Request for Information.

1. The term “arrangement” means every separate contract or other agreement between two or more persons, whether written or oral.
2. The term “Brosval Chemicals, Inc.” shall mean the company (Registry No. 75,195) that was incorporated under the laws of Puerto Rico on April 6, 1990, according to documents filed with the Puerto Rico Secretary of State.
3. The term “Compañía Ganadera Del Sur, Inc.” shall mean the company (Registry No. 4107) that was incorporated under the laws of Puerto Rico on December 3, 1953, according to documents filed with the Puerto Rico Secretary of State.
4. The term “Corporacion Agricola Peñolana, Inc.” shall mean the company (Registry No. 78,375) that was incorporated under the laws of Puerto Rico on June 18, 1991, according to documents filed with the Puerto Rico Secretary of State.
5. The term “documents” includes any written, recorded, computer-generated, visually, or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

6. The term “entity” or “entities” refers to persons, individuals, companies, partnerships, or any other type of business association.
7. The term “hazardous substance” shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances. The substances that have been designated as hazardous substances pursuant to Section 102(a) of CERCLA, 42 U.S.C. § 9602(a), (which, in turn, comprise a portion of the substances that fall within the definition of “hazardous substance” under Section 101(14) of CERCLA) are set forth at 40 C.F.R. Part 302.
8. The term “hazardous waste” shall have the same definition as that contained in Section 1004(5) of the Resource Conservation and Recovery Act, as amended (“RCRA”), 42 U.S.C. § 6903(5).
9. The term “identify” means, with respect to a natural person, to set forth the person’s full name, present or last known employer, business address, and business telephone number, as well as the present or last known home address and home telephone number. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term “identify” means to provide its full name, address, and any affiliation or contractual relationship it has with the individual and/or Company to whom/which this Supplemental Request for Information is addressed.
10. The term “industrial waste” shall mean any solid, liquid, or sludge or any mixtures thereof that possess any of the following characteristics:
 - a. it contains one or more “hazardous substances” (at any concentration) as defined in Section 101(14) of CERCLA;
 - b. it is a “hazardous waste” as defined in Section 1004(5) of RCRA;
 - c. it has a pH less than 2.0 or greater than 12.5;
 - d. it reacts violently when mixed with water;
 - e. it generates toxic gases when mixed with water;
 - f. it easily ignites or explodes;
 - g. it is an industrial waste product;
 - h. it is radioactive;
 - i. it is an industrial treatment plant sludge or supernatant;
 - j. it is an industrial byproduct having some market value;
 - k. it is coolant water or blowdown waste from a coolant system;
 - l. it is a spent product that could be reused after rehabilitation; or
 - m. it is any material that you have reason to believe would be toxic if either ingested, inhaled, or placed in contact with skin.

11. The term “material” or “materials” means any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
12. The term “person” shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
13. The term “release” shall have the same definition as that contained in Section 101(22) of CERCLA, which includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
14. The term “Site” shall mean the PROTECO Site, including the real property located at Road 385, Km 4.4, Bo. Tallaboa, Peñuelas, Puerto Rico (the latter referred to herein as the “Site property”).
15. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
16. The term “you” shall mean Brosval Chemicals, Inc., the addressee of this Supplemental Request for Information.
17. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

ATTACHMENT B

REQUEST FOR INFORMATION

1. In your May 23, 2019 response (#3), you indicated that Compañía Ganadera Del Sur, Inc. ended operations on December 31, 1996. Please explain the manner in which Compañía Ganadera Del Sur, Inc. “ended operations” and provide supporting documentation. Explain whether the company still exists under a different name, was dissolved, or was purchased by another company.
2. If Compañía Ganadera Del Sur, Inc. was dissolved, describe the circumstances surrounding its dissolution, including in your answer the following:
 - a. the exact date of dissolution;
 - b. the names and addresses of any and all shareholders at the time of dissolution;
 - c. the value of all assets distributed to each shareholder as a result of the dissolution;
 - d. the final disposition or distribution of all assets, liabilities, and shares of Compañía Ganadera Del Sur, Inc.;
 - e. the identity of all parties to any transactions relating to or arising out of the dissolution; and
 - f. a description of all documents relating to the dissolution.
3. State whether any business records of Compañía Ganadera Del Sur, Inc. are still in existence. If the answer is yes, produce the following:
 - a. all documents relating to the disposal of any hazardous substances, hazardous wastes, and/or industrial wastes at the Site;
 - b. all documents relating to Compañía Ganadera Del Sur, Inc.’s ownership of the Site property; and
 - c. all documents relating to Compañía Ganadera Del Sur, Inc.’s lease of the Site property to Servicios Carbareon, Inc, Protección Técnica Ecológica Corp., and Resources Management, Inc.
4. Identify any successor corporations or other entities of Compañía Ganadera Del Sur, Inc.
5. Describe any asset purchase agreements, whereby some or all of the assets of Compañía Ganadera Del Sur, Inc. were sold to any other entity, including the date(s), the companies and/or individuals involved, and the terms of such asset purchase agreement(s).
6. In your May 23, 2019 response (#4), you indicated that the Site property was sold to Brosval Chemicals, Inc. in 1996. According to Exhibit 5 of your May 23, 2019 response, Brosval Chemicals, Inc. acquired property from Compañía Ganadera Del Sur, Inc. pursuant to deed number twenty-nine (29) executed on October 11, 1996 before Notary Rosa Caraballo Rodriquez. Please provide a full and complete copy of deed number 29

and/or any other deed transferring the Site property from Compañia Ganadera Del Sur, Inc. to Brosval Chemicals, Inc.

7. Exhibit 2 of your May 23, 2019 response is a copy of deed number 40, which provides the following: *“Jorge Lucas Perez Valdivieso Torruella is the owner of a fifty percent (50%) interest in the Property, and Lucas Perez Valdivieso Tonuella together with Yesmin Galib Frau, are the owners of the other fifty percent (50%) interest in the Property pursuant to Deed Number Sixty-Three (63) of Division of Community Property executed in San Juan, Puerto Rico on December twenty-three (23), nineteen hundred eighty-five (1985) before Notary Public Juan Mendez Solis, as rectified by Deed Number Fifty-Six (56) executed in San Juan, Puerto Rico on June six (6), nineteen hundred eighty-six (1986) and by Deed Number Four (4) executed in Ponce, Puerto Rico on January twenty-three (23), nineteen hundred eighty-seven (1987), both executed before Notary Public Juan Mendez Solis. Said deeds are recorded at the Registry on page ninety-seven (97), volume one hundred forty-three (143) of Peñuelas, property number two thousand one hundred ten (2,110), seventeenth inscription.”* Please provide full and complete copies of the aforementioned deed number 63, deed number 56, and deed number 4.
8. Exhibit 1 of your May 23, 2019 response is a copy of deed number 9, dated July 7, 1999, which provides that Compañia Ganadera Del Sur, Inc. “represents and warrants that it is the sole owner in fee simple” of a 42-cuerdas parcel of land, on which hazardous waste units at PROTECO were closed. Please explain why this deed identifies Compañia Ganadera Del Sur, Inc. as the owner of the 42-cuerdas parcel in 1999 if Brosval Chemicals, Inc. is allegedly to have acquired the property in 1996 and Compañia Ganadera Del Sur, Inc. allegedly ceased operations in 1996.
9. Exhibit 1 of your May 23, 2019 response references a lease in favor of PROTECO, which lease was: *“constituted pursuant to Deed Number One (1) executed in Peñuelas, Puerto on September seventeen (17), nineteen hundred eighty-one (1981), before Notary Francis Torres Fernandez and is recorded in the Registry at page number fifty (50) of volume eighty-four (84) of Peñuelas, property number two thousand two hundred two (2,202), ninth (9th) inscription, as amended by Deed Number Ten (10) executed in San Juan, Puerto Rico, on March five (5), nineteen hundred eighty-six (1986), before Notary Blás R. Ferraiolli Martinez, as corrected by Deed Number Sixteen (16) executed in San Juan, Puerto Rico, on November six (6), nineteen hundred eighty-six (1986), before Notary José A. Axtmayer, which deeds are recorded at page number forty-one (41) of volume number one hundred twenty-eight (128) of Peñuelas, property number two thousand two hundred two (2,202), tenth (10th) inscription.”* Please provide full and complete copies of the aforementioned deed number 1, deed number 10, and deed number 16.
10. Exhibit 3 of your May 23, 2019 response references deed number thirty-six (36), granted in Ponce, Puerto Rico on May 5, 1954 before Notary Raul Mato and which transferred property to Compañia Ganadera Del Sur, Inc. Please provide a full and complete copy of deed number 36.

11. Exhibit 7 of your May 23, 2019 response references an “Exhibit A” that describes Parcels 1 and 2 under the April 19, 1995 Option Agreement for the Lease of Real Property by and among Compañía Ganadera Del Sur, Inc., Environmental Protection Associates Corp., and Resources Management, Inc. d/b/a PROTECO. Please provide a complete and legible copy of the aforementioned Exhibit A.
12. Exhibit 8 of your May 23, 2019 response references an “Exhibit A” and “Exhibit B” that describe property to be leased under the August 16, 1983 Agreement for Lease of Real Estate between Compañía Ganadera Del Sur, Inc. and Servicios Carbareon, Inc. Please provide complete and legible copies of the aforementioned Exhibit A and Exhibit B.
13. Exhibit 10 of your May 23, 2019 response references an “Exhibit A” and “Exhibit B” that describe the leased property and title exceptions, respectively, under the October 15, 1996 Agreement for Lease of Real Estate by and between Compañía Ganadera Del Sur, Inc., Brosval Chemicals, Inc., Environment Preservation Associates Corp., Corporacion Agricola Peñolana, Inc., and Resources Management, Inc. Please provide complete and legible copies of the aforementioned Exhibit A and Exhibit B.
14. In your May 23, 2019 response (#27), you indicated that documents responsive to EPA’s request for Brosval Chemicals, Inc.’s financial statements, shareholder’s reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years “will be provided at a later date.” To date, EPA has not received any financial records relating to Brosval Chemicals, Inc. Please provide Brosval Chemicals, Inc.’s financial statements, shareholder’s reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years.
15. Please provide copies of Compañía Ganadera Del Sur, Inc.’s financial statements, shareholder’s reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years. If Compañía Ganadera Del Sur, Inc. no longer exists, please provide Compañía Ganadera Del Sur, Inc.’s financial statements, shareholder’s reports, financial audits, or other financial reports showing its assets, profits, liabilities, and current financial status for the last five years of the company’s existence.
16. In your May 23, 2019 response (#28), you indicated that you were searching for insurance policies responsive to EPA’s request and that you “will provide when found.” To date, EPA has not received any insurance policies for Brosval Chemicals, Inc. Please list and provide a copy of all agreements or contracts, including but not limited to insurance policies and indemnification agreements, held or entered into by Brosval Chemicals, Inc. or its parent corporation(s), subsidiary, or subsidiaries that could indemnify it against any liability that it may have under CERCLA for releases or threatened releases of hazardous substances at the Site. In response to this Request, please provide not only those insurance policies and agreements that currently are in

effect, but also provide those that were in effect during the period(s) when any hazardous substances, hazardous wastes, and/or industrial wastes may have been released or threatened to be released into the environment at the Site.

17. Describe the ownership structure of Compañía Ganadera Del Sur, Inc. Identify all individuals who have or had an ownership interest in Compañía Ganadera Del Sur, Inc.
18. Describe the nature and extent of any ownership interest that Mr. Jorge Valdivieso has or had in Compañía Ganadera Del Sur, Inc. Describe when and how such ownership interest was acquired.
19. Provide a history (e.g., payment dates, amounts received, etc.) of dividends or disbursements received by Mr. Jorge Valdivieso from Compañía Ganadera Del Sur, Inc. resulting from Mr. Jorge Valdivieso's ownership of capital stock in Compañía Ganadera Del Sur, Inc.
20. Indicate whether Compañía Ganadera Del Sur, Inc. maintained corporate meeting minutes. If the answer is yes, provide Compañía Ganadera Del Sur, Inc.'s corporate meeting minutes.
21. Describe the ownership structure of Brosval Chemicals, Inc. Identify all individuals who have or had an ownership interest in Brosval Chemicals, Inc.
22. Describe the nature and extent of any ownership interest that Mr. Jorge Valdivieso has or had in Brosval Chemicals, Inc. Describe when and how such ownership interest was acquired by Mr. Valdivieso.
23. Provide a history (e.g., payment dates, amounts received, etc.) of dividends or disbursements received by Mr. Valdivieso from Brosval Chemicals, Inc. resulting from Mr. Valdivieso's ownership of capital stock in Brosval Chemicals, Inc.
24. Indicate whether Brosval Chemicals, Inc. maintained corporate meeting minutes. If the answer is yes, provide Brosval Chemicals, Inc.'s corporate meeting minutes.
25. Describe the ownership structure of Corporacion Agricola Peñolana, Inc. Identify all individuals who have or had an ownership interest in Corporacion Agricola Peñolana, Inc.
26. Describe the nature and extent of any ownership interest that Mr. Valdivieso has or had in Corporacion Agricola Peñolana, Inc. Describe when and how such ownership interest was acquired by Mr. Valdivieso.
27. Provide a history (e.g., payment dates, amounts received, etc.) of dividends or disbursements received by Mr. Valdivieso from Corporacion Agricola Peñolana, Inc.

resulting from Mr. Valdivieso's ownership of capital stock in Corporacion Agricola Peñolana, Inc.

28. Indicate whether Corporacion Agricola Peñolana, Inc. maintained corporate meeting minutes. If the answer is yes, provide Corporacion Agricola Peñolana, Inc.'s corporate meeting minutes.
29. Please provide all documents, if not already requested above, that support your responses to Requests #1 - #28, above.
30. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
31. State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Supplemental Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State/Commonwealth of _____

County/Municipality of _____

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

NAME (print or type)

TITLE (print or type)

SIGNATURE

Sworn to before me this

_____ day of _____ 2020.

Notary Public